

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON**

UNITED STATES OF AMERICA)	
)	Case No.
v.)	
)	Violations:
)	
)	18 U.S.C. § 371
LEELYNN DANIELLE CHYTKA)	18 U.S.C. § 1349/ § 1341
)	18 U.S.C. § 1028A
)	21 U.S.C. § 841(a)(1)

INFORMATION

INTRODUCTION

The United States Attorney Charges that:

CARES Act and Pandemic Unemployment Benefits

1. Unemployment Insurance (UI) is a state-federal program that provides monetary benefits to eligible lawful workers. Although state workforce agencies (SWAs) administer their respective UI programs, they must do so in accordance with federal laws and regulations. UI payments (benefits) are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Each state sets its own additional requirements for eligibility, benefit amounts, and length of time benefits can be paid. Generally, UI weekly benefit amounts are based on a percentage of earnings over a base period. In the Commonwealth of Virginia, the Virginia Employment Commission (VEC) administers the UI program.

2. On March 13, 2020, the President of the United States declared the ongoing Coronavirus Disease (COVID-19) pandemic to be an emergency under §501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C §§ 5121-5207).

3. On March 18, 2020, the President signed the Families First Coronavirus Response Act (“FFCRA”) into law. The FFCRA provided additional flexibility for state UI agencies and additional administrative funding to respond to the COVID-19 pandemic. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was signed into law on March 27, 2020. The CARES Act expanded states’ ability to provide UI for many workers impacted by COVID-19, including for workers who were not ordinarily eligible for UI benefits. The CARES Act provided for three new UI programs: Pandemic Unemployment Assistance (“PUA”); Federal Pandemic Unemployment Compensation (“FPUC”); and Pandemic Emergency Unemployment Compensation (“PEUC”).

4. The first program, PUA, provides for up to 39 weeks of benefits to individuals who are self-employed, seeking part-time employment, or otherwise did not qualify for regular UI or extended benefits under state or federal law or PEUC (detailed further below). Coverage includes individuals who have exhausted all rights to regular UI benefits or extended benefits under state or federal law or PEUC. Under the PUA provisions of the CARES Act, a person who is a business owner, self-employed worker, independent contractor, or gig worker can qualify for pandemic unemployment benefits administered by the

VEC if he/she previously performed such work in Virginia and is unemployed, partially unemployed, unable to work, or unavailable to work due to a COVID-19 related reason. The eligible timeframe to receive PUA includes weeks of unemployment beginning on or after January 27, 2020 through December 31, 2020.

5. The second program, PEUC, is a state-federal program that provides for up to 13 weeks of benefits to individuals who have exhausted regular UI under state or federal law, have no rights to regular UI under any other state or federal law, are not receiving UI under the UI laws of Canada, and are able to work, available for work, and actively seeking work. Under this program, states must offer flexibility in meeting the “actively seeking work” requirement if individuals are unable to search for work because of COVID-19, including because of illness, quarantine, or movement restriction. The eligible timeframe to receive PEUC includes weeks of unemployment beginning after the respective state has an established agreement with the federal government through December 31, 2020. The earliest being April 5, 2020.

6. The third program, FPUC, provides individuals who are collecting regular UI, PEUC, PUA, and several other forms of benefits with an additional \$600 per week. The eligible timeframe to receive FPUC was from weeks of unemployment beginning after the respective state had an established agreement with the federal government through July 31, 2020. The earliest being April 5, 2020.

7. On August 8, 2020, after FPUC expired, the President signed a Presidential Memorandum authorizing FEMA to use disaster relief funds pursuant to Section 408 of the Stafford Act to provide supplemental payments for lost wages to help ease the financial burden on individuals who were unemployed as a result of COVID-19. The “Lost Wages Assistance Program” (“LWAP”) served as a temporary measure to provide an additional \$300 per week via a total of \$44 billion in FEMA funds. The period of assistance for LWAP was August 1, 2020 to December 27, 2020.

8. In total, more than \$300 billion in additional federal funds for UI were appropriated in 2020.

9. The PUA, FPUC, and LWAP programs (collectively, “pandemic unemployment benefits”) are administered by the various states, including the Commonwealth of Virginia, but their benefits are funded by the federal government. In order to receive pandemic benefits, an applicant must access a website maintained and administered by the VEC and file a claim. Separate claims are not filed for PUA, FPUC, and LWAP. Rather, a single claim for PUA, if approved, results in an approved claim for the additional FPUC and LWAP benefits as well.

10. Individuals are only eligible for pandemic unemployment benefits if they are unemployed for reasons related to the COVID-19 pandemic and are otherwise available to work and are seeking employment.

11. Once an applicant is at the website, the applicant is required to enter

personally identifiable information (PII) including name, date of birth, Social Security Number, email address, phone number, and physical address. An applicant is then required to answer a series of questions to determine eligibility and payment amount. An applicant must then attest, under penalty of perjury, that the information provided in the claim application is true and accurate.

12. Upon completion, the application is submitted to the VEC. If approved, the applicant can choose whether to have the pandemic unemployment benefits deposited directly into a bank account of their choosing, or the funds can be loaded on a pre-paid debit card which is then shipped to the applicant via United States Postal Service to the address listed on their application.

13. The recipient of pandemic unemployment benefits receives a unique Personal Identification Number ("PIN") to access the VEC each week to re-certify their unemployment status. Payments for pandemic unemployment benefits are based on a seven-day period, from Sunday through Saturday. Thus, the benefits recipient must certify every seven days that he or she: was ready, willing and able to work each day; was seeking full time employment; did not refuse any job offers or referrals; and had reported any employment during the week and the gross pay or other payments received.

14. In or around June 2020, the VEC began reviewing UI and PUA claims to identify fraudulent claims. By August 2020, the VEC officials had learned from other states that inmates in correctional facilities were receiving UI

benefits.

15. Incarcerated individuals are not eligible for pandemic unemployment benefits inasmuch as their unemployment was a result of their incarceration and not related to COVID-19. These individuals are unemployed due to their own criminal conduct and not due to COVID-19 reasons. Additionally, because incarcerated individuals are no longer able to actively seek full-time employment due to their incarceration, they are not eligible to receive pandemic unemployment benefits for the period of time they are incarcerated.

16. Consequently, the VEC obtained a list of approximately 39,000 inmates housed by the Virginia Department of Corrections and cross-matched the Virginia UI and PUA claims to people who were shown to be claimants on the inmate list. The analysis revealed over 6,000 claims filed on the behalf of inmates in Virginia, totaling over \$85 million in paid claims.

17. The Southwest Virginia Regional Jail Authority-Duffield (SWRJA-Duffield) and Southwest Virginia Regional Jail Authority-Abingdon (SWRJA-Abingdon) are both located in the Western District of Virginia.

18. 108 Twin Circle Drive, Lebanon, VA 24266 is in the Western District of Virginia.

The Conspiracy

19. In May 2020 Leelynn Danielle CHYTKA (CHYTKA), Greg Tackett (G.T.), and Jeff Tackett (J.T.) developed a scheme and artifice to file fraudulent claims for pandemic unemployment benefits via the VEC website. The scheme

and artifice was to submit claims for various individuals, including CHYTKA, G.T., and J.T., who were ineligible to receive pandemic unemployment benefits, by making materially false representations including, but not limited to: that the applicant was unemployed as a result of COVID-19; using a fictitious employer as the name of the last employer when the applicant became unemployed due to COVID-19; that the applicant was ready, willing, and able to work each day; and that the applicant was actively seeking full-time employment.

20. Because pandemic unemployment benefits were paid on a weekly basis, the scheme was a continuing scheme whereby CHYTKA, G.T., and J.T. agreed and conspired to file weekly re-certifications for the claims they submitted. In so doing, CHYTKA re-verified and re-certified the same materially false representations and pretenses as stated herein for each claim submitted, on numerous occasions as further detailed below.

21. At the time the scheme was devised, J.T. was incarcerated at the Southwest Virginia Regional Jail Authority – Duffield (SWVRJA-Duffield) and incapable of accessing a computer system in order to file his own fraudulent claim. In furtherance of the scheme, J.T. provided all PII required to file his claim to CHYTKA via email and telephone communications. CHYTKA and G.T. then filed a fraudulent claim on behalf of J.T.

22. After CHYTKA, G.T., and J.T. began receiving pandemic unemployment benefits, the scheme broadened to include other inmates at SWVRJA-Duffield, and other family members and friends of CHYTKA's, G.T.'s,

and J.T.'s, each of whom were then known to be ineligible for pandemic unemployment benefits.

23. In furtherance of the scheme, J.T. approached those co-conspirators who were then incarcerated at SWVRJA-Duffield and told them he had a way to make money by submitting claims for pandemic unemployment benefits on their behalf. The incarcerated co-conspirators then provided their PII to J.T., who then conveyed the information to CHYTKA and G.T. via email and telephone communications for the purpose of filing a claim.

24. Co-conspirators who were *not* incarcerated at the time of their filing provided their own PII to CHYTKA and G.T. for the purpose of filing their claims.

25. Some co-conspirators agreed that in exchange for filing their respective fraudulent claims, CHYTKA, G.T., and J.T. could keep a portion of the money the respective co-conspirators received. Some co-conspirators gave their PII to CHYTKA and G.T. in exchange for controlled substances. CHYTKA, G.T., and J.T. also filed fraudulent claims for other co-conspirators based solely on their close family or personal relationships.

26. To effect the object of the conspiracy, CHYTKA and G.T. used the address of the residence in which they lived: 108 Twin Circle Drive, Lebanon, VA 24266 for all co-conspirators' applications. By doing this, CHYTKA and G.T. ensured the government pre-paid debit cards used to disburse pandemic unemployment benefit payments were all sent to their address. Once claims were approved, pre-paid debit cards were mailed via United States Postal

Service to this address.

27. Thirty-nine (39) pandemic unemployment benefit claims used the address of 108 Twin Circle Drive, Lebanon, Virginia 24266.

28. 108 Twin Circle Drive, Lebanon, Virginia, 24266 was the residence of CHYTKA and G.T.

29. CHYTKA, G.T., and J.T. were all listed on the VEC's records as having applied for, and received, pandemic unemployment benefits while using the 108 Twin Circle Drive address. Their claims were the first three claims filed using the 108 Twin Circle Drive address. CHYTKA's application was filed with the VEC on May 11, 2020, G.T.'s application was filed with the VEC on May 20, 2020 and J.T.'s application was filed with the VEC on June, 3, 2020.

30. On twelve (12) of the pandemic unemployment claims that used the 108 Twin Circle Drive address, "Walls" was provided as the answer to the claimant application security question "What is your mother's maiden name?" "Walls" is CHYTKA's maiden name.

31. On seventeen (17) of the pandemic unemployment claims that used the 108 Twin Circle Drive address, the telephone number XXX-XXX-5856 was used. This telephone number is CHYTKA's cell phone number.

32. Investigators interviewed fifteen (15) inmates at the SWVRJA-Duffield and SWVRJA-Abingdon facilities. As detailed below, several inmates provided statements stating J.T. approached inmates and told them he had a way of submitting claims for pandemic unemployment benefits on their behalf. One

inmate told investigators several of the individuals shared a common “pod” together at the SWVRJA-Duffield facility and they commonly discussed the plan to submit information for pandemic unemployment benefits. The incarcerated individuals provided their Social Security Numbers and dates of birth to J.T., who then conveyed that information to CHYTKA and G.T. via email and telephone communications for the purpose of filing the fraudulent claims.

Manner and Means of the Conspiracy

33. In order to effect the object of the conspiracy, the co-conspirators undertook the following overt acts, as well as others not detailed herein:

34. CHYTKA

CHYTKA was interviewed by investigators on January 26, 2021 while incarcerated at the Lincoln County Detention Center located in Lincolnton, North Carolina. CHYTKA confessed to filing fraudulent claims for pandemic unemployment benefits for herself, J.T., G.T. and at least thirty-six (36) other individuals associated with the address of 108 Twin Circle Drive, Lebanon, Virginia. In a recorded interview, CHYTKA told investigators the following:

a. In May 2020, CHYTKA discovered she could make money by applying for pandemic unemployment benefits via the VEC website. CHYTKA sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits. CHYTKA told investigators she was employed by a company called “Appen” at the time of her filing and was not otherwise eligible for pandemic unemployment benefits.

b. On May 11, 2020, CHYTKA filed a claim with the VEC. The claim was processed and approved. Upon approval, the VEC sent confirmation information to CHYTKA via email to a GMAIL account she listed on her application. Payments were initially made to CHYTKA via electronic funds transfer to a bank account listed on her application.

c. CHYTKA also received via United States Post a Mastercard pre-paid debit card in her name at 108 Twin Circle Drive, Lebanon, VA 24266. At some point thereafter, CHYTKA elected to receive payments to this debit card rather than the original bank account.

d. In order to continue to receive weekly pandemic unemployment benefit deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications using her computer, by accessing the VEC website.

e. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to CHYTKA, including PUA and LWAP payments.

f. With the assistance of other individuals, including J.T. and G.T., CHYTKA filed claims for pandemic unemployment benefits for those individuals associated with the 108 Twin Circle Drive address. In addition, as detailed below, CHYTKA also told investigators she filed fraudulent claims for several friends and family members but used their own addresses so payments went directly to them.

g. CHYTKA told investigators she attempted to start a business called "D&R Accounting" in order to facilitate the filing of pandemic

unemployment claims. According to CHYTKA, “D&R” stood for “Danielle and Roo.” “Roo” is a known alias for G.T. CHYTKA explained to investigators she wanted to make her business “legit” – that instead of stealing other people’s unemployment money, she wanted to eventually charge people a fee for her service of filing fraudulent claims. CHYTKA was further questioned by investigators whether indeed it was her intent to create a “legitimate” business for the purpose of filing fraudulent claims of unemployment. CHYTKA responded “yes” - that had been her intent.

h. CHYTKA classified the other co-conspirators into three general categories: 1) inmates at the SWVRJA-Duffield whose PII was passed on to her by J.T. so CHYTKA could file fraudulent claims with the VEC; 2) personal friends of CHYTKA’s, G.T.’s, and J.T.’s who provided CHYTKA with their PII so CHYTKA could file fraudulent claims with the VEC; and 3) acquaintances of G.T.’s who provided CHYTKA with PII so CHYTKA could file fraudulent claims with the VEC, even though they were not eligible to receive such benefits. CHYTKA told investigators several of these co-conspirators provided their PII in exchange for G.T. providing them controlled substances.

i. After successfully filing for pandemic unemployment benefits on behalf of inmates, CHYTKA received via United States Post a prepaid debit card in each inmate’s name at 108 Twin Circle Drive, Lebanon, VA 24266. CHYTKA and G.T. then used the debit cards to their own benefit, and CHYTKA occasionally sent money to the inmates’ commissary accounts in jail as directed

by J.T.

j. CHYTKA told investigators she only loaded inmates' commissary accounts if J.T. directed her to do so. There were several inmates for whom CHYTKA filed fraudulent claims and received pandemic unemployment benefit disbursements through the VEC who did not receive any money on their commissary accounts.

k. On or around the dates their respective claims were filed with the VEC, CHYTKA's friends and G.T.'s acquaintances, met with CHYTKA or G.T. at their residence located at 108 Twin Circle Drive, Lebanon, VA. Each provided CHYTKA or G.T. with his/her PII. CHYTKA entered this information into the VEC website and filed each co-conspirator's application due to her familiarity with the system.

l. After successfully filing claims for these co-conspirators, CHYTKA received via United States Post a pre-paid debit card in the individual's name at 108 Twin Circle Drive, Lebanon, VA 24266. CHYTKA and G.T. usually kept these cards and paid these individuals in cash, illicit drugs, or other items of value (including providing some individuals with vehicles).

m. In order to continue receiving weekly deposits to the prepaid debit cards, CHYTKA made subsequent weekly re-certifications on the individuals' behalf.

n. CHYTKA filed all claims electronically using her personal computer from her home at 108 Twin Circle Drive, Lebanon, VA 24266.

CHYTKA filed all claims by accessing the VEC website via the internet.

35. **G.T.**

a. On May 20, 2020, G.T. provided his PII, including his Social Security Number and date of birth CHYTKA. On May 20, 2020, CHYTKA filed a claim with the VEC on G.T.'s behalf. The claim was processed and approved. Payments were initially made via electronic funds transfer to a bank account listed on the application.

b. Between on or about May 20, 2020 and on or about May 30, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in G.T.'s name at 108 Twin Circle Drive, Lebanon, VA 24266. At some point thereafter, CHYTKA elected to receive payments to this debit card rather than the original bank account.

c. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on G.T.'s behalf.

d. The filing of this fraudulent claim resulted in not less than \$18,320.00 being paid to G.T., including PUA and LWAP payments.

e. G.T. was interviewed by investigators on January 12, 2021. G.T. admitted to signing up for pandemic unemployment benefits in May 2020. G.T. said he and his "old lady" (CHYTKA) entered his information in the computer together.

f. G.T. told investigators he was not incarcerated at the time he filed for pandemic unemployment benefits and he had been out of jail for several

months in May 2020. G.T. told investigators he was formerly employed at Ace Tree Service and T & M Home Solutions, but T & M Home Solutions “was not a legit business”, and he “just made it up – [he] made up a name and was doing handyman work.”

g. G.T. initially maintained he filed for pandemic unemployment benefits “legitimately” based upon his unemployment from Ace Tree Service and T & M Solutions. Investigation determined this to be false. G.T. told investigators he was unable to seek employment during the time he filed for pandemic unemployment benefits because he “went on the run”. G.T. told investigators prior to filing for unemployment, he had been charged with possession of controlled substances, was incarcerated for about six months before receiving a bond, then “went on the run” to avoid apprehension. As such, G.T.’s unemployment was not due to COVID-19.

h. When pressed by investigators on how he assisted CHYTKA with the scheme to file fraudulent claims, G.T. told investigators “I mean, I just signed people up...”. G.T. then told investigators he signed up his “PawPaw” (D.L.M. Sr.), but explained “...but he didn’t know, it got locked, I never got it...like, I mean, he didn’t even know.”

i. G.T. told investigators he also signed up his mother, V.M. G.T. told investigators he gave his mother some of the money but did not give her all the money. G.T. told investigators his mother did not have any knowledge he had signed her up. The investigation determined these statements to be false.

As detailed below, V.M. admitted to providing her own PII to CHYTKA. Jailhouse telephone calls revealed the following conversation between G.T. and V.M. on January 15, 2021:

V.M.: So what'd they say about me, Roo?...

G.T.: I told them that I did it...that I filed under your name and that you didn't know, so...you'll be good, Mama. I, uh, I caught a Federal felony, but you're good though. Don't worry, I got it

...I told them, where I did the pandemic assistance and stuff, I just told them that when I gave you the card I said that it was just pandemic assistance. That it – it was me that filed it – I did it all, so...I'm sorry – but I didn't want you in trouble and stuff, so – I didn't know what else to tell 'em.

j. G.T. told investigators the reason there were so many names associated with the 108 Twin Circle Drive address was because there was a business operated out of the house called D&R Accounting LLC. On a recorded jailhouse telephone call between G.T. and his mother, V.M., on January 11, 2021, G.T. admitted “we filed for people under the accountant business.” Knowing jailhouse calls are monitored, V.M. interrupted G.T., saying “watch what you say...”.

36. J.T.

a. Once CHYTKA and G.T. each began receiving pandemic unemployment benefits, CHYTKA discussed the scheme with J.T. and explained how he could also receive money.

b. Between on or about May 28, 2020, and on or about May 31, 2020, J.T. provided his PII, including his Social Security Number and date of

birth, to CHYTKA.

c. On June 3, 2020, CHYTKA filed a claim with the VEC on J.T.'s behalf. Emails between CHYTKA and J.T. show J.T.'s interest in the status of his claim. CHYTKA's response demonstrates her efforts to file the required certifications.

Jeffery Tackett	Danielle Chytka	06/01/2020 12:48PM
RE: Text Message		
did you hear anything about my unemployment? and w.e you can spare i owe 50 to the store box if yall do like 80 ill be straight. i know im a bum this shit sucks ass frfr i love ya if that unemployment shit comes thru yall can have most of that "if" it comes thru		
Danielle Chytka	Jeffery Tackett	06/04/2020 3:27PM
Text Message		
Ily hopefully we will figure something out about ur unemployment stuff soon I finished all the weekly claims today so in the next few days hopefully it'll hit the bank. Keep ur head up ull be out soon		

d. The claim was processed and approved. On June 8, 2020, CHYTKA informed J.T. his claim had been approved and G.T. (nicknamed "Roo") would use the funds to buy J.T. a truck. In an email response, J.T. demonstrated his understanding of the object of the scheme, and his willing participation in the scheme.

Danielle Chytka	Jeffery Tackett	06/08/2020 3:46AM
Text Message		
Hey guess what!!!!? Ur unemployment came in!!! Roos gonna get u a truck n it wouldn't let me put more on ur books it said u had reached the max 300 a week but I put 200\$ on there. We love ya always		
Jeffery Tackett	Danielle Chytka	06/08/2020 9:36AM
RE: Text Message		
hell yea thats whats up you the best frfr how much they give me? i need you to put some on dougs books too ily put like 100 on his frfr i love your ass		

e. Payments were initially made via electronic funds transfer to a

bank account listed on the application.

f. Between on or about June 3, 2020 and on or about June 13, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in J.T.'s name at 108 Twin Circle Drive, Lebanon, VA 24266. At some point thereafter, CHYTKA elected to receive payments to this debit card rather than the original bank account.

g. CHYTKA and G.T. did not initially provide the debit card to J.T., as he was incarcerated. CHYTKA and G.T. used the debit card for their benefit, and occasionally sent money to J.T.'s commissary account.

h. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.T.'s behalf.

i. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to J.T., including PUA and LWAP payments.

j. As further detailed below, J.T. assisted CHYTKA and G.T. in filing claims for pandemic unemployment assistance for co-conspirators who were incarcerated at the time of their filing. For each of these co-conspirators, J.T. conveyed the PII required so CHYTKA could file fraudulent claims.

k. Investigators interviewed J.T. on January 12, 2021 while J.T. was incarcerated at SWVRJA-Abingdon. During this interview, J.T. admitted to providing his PII to CHYTKA while he was incarcerated for the purpose of CHYTKA filing a claim for pandemic unemployment benefits on his behalf. J.T. told investigators the extent of his involvement was his own claim, and he only

benefitted approximately \$1,600.00 from the scheme. Investigation determined this to be a false statement.

l. J.T. eventually told investigators he passed on a lot of people's PII to CHYTKA and she paid them \$100 and paid J.T. for passing on the information. J.T. then told investigators he "had no clue" it was for unemployment, instead thinking it was stimulus money. Investigation determined these statements to be false. Numerous email messages between J.T. and CHYTKA, and J.T. and various other inmates reveal frequent discussion of filing for unemployment claims. In a recorded jailhouse video chat on December 14, 2020, J.T. demonstrated his complete knowledge of the scheme to submit fraudulent claims for pandemic unemployment when he spoke with B.J.:

J.T. Hey – did you ever sign up on that fucking shit that everyone's getting?

B.J. No.

J.T. Well you should getit ends, today's the last fucking day, well tomorrow – the 15th.

B.J. Wait – um – unemployment?

J.T. Yeah.

B.J. Nigga - I'm not tryin' to fuckin' catch no fed charges

J.T. Ayight, but, you ain't going to, but...

m. During the interview, J.T. claimed his mother, V.M., had nothing

to do with signing up for pandemic unemployment benefits. J.T. said “my mother doesn’t even know her unemployment has even been signed up.” Investigation determined this to be a false statement. In a recorded jailhouse telephone call the night before, on January 11, 2021, J.T. told his mother, V.M. he “fucked up” and was caught with “all them debit cards.” V.M. then told J.T. she didn’t know CHYTKA was filing so many fraudulent claims until she “went in to check my claim.” J.T. interrupted his mother and said “stop, stop, stop – don’t say nothing else over this phone.”

37. A.A.

a. A.A. is an acquaintance of CHYTKA’s. In or about July 2020, A.A. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. A.A. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits.

c. On or about July 21, 2020, A.A. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA. A.A. provided her PII to CHYTKA, including her Social Security Number and date of birth. Although A.A. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 21, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on A.A.’s behalf.

e. Between on or about July 21, 2020 and on or about August 1,

2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of A.A. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on A.A.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$4,454.00 being paid to the pre-paid debit card assigned to A.A., including PUA and LWAP payments.

h. CHYTKA and G.T. did not initially provide the debit card to A.A. CHYTKA and G.T. used the debit card for their benefit while occasionally providing cash and drugs to A.A.

38. **J.B.**

a. J.B. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.B. was incarcerated at all times relevant to this scheme. J.B.'s unemployment was due to his incarceration and not due to COVID-19.

b. Between or about July 10, 2020 and on or about July 17, 2020, J.B. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed the PII to CHYTKA so she could file a claim for pandemic unemployment benefits with the VEC on J.B.'s behalf.

c. On or about July 17, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.B.'s behalf.

d. Between on or about July 17, 2020 and on or about July 27,

2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.B. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.B.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$15,192.00 being paid to the pre-paid debit card assigned to J.B., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.B. \$15,192.00 was reclaimed by the VEC after fraudulent activity was detected.

g. In a recorded interview, J.B. told investigators he was unaware an unemployment claim had been filed on his behalf with the VEC. Investigation determined this statement to be false.

h. On December 10, 2020, after J.T. was released from jail, J.T. confirmed he was in possession of J.B.'s unemployment benefits in an email sent to J.B. In response to this email on December 16, 2020, J.B. demonstrated his understanding of the object of the scheme, and his willing participation in the scheme.

Communications with Tackett , Jeff, Jtackett91@yahoo.com

Jeff Tackett

12/10/2020 6:04AM

Aye dawg how you doi...

Aye dawg how you doing . I got your unemployment I just need ss# to file the claims . just call me

Jeff Tackett

12/16/2020 3:15PM

RE: Aye dawg how you doi...

1992 thanks bro i can really use the money right now

39. G.B.

a. G.B. is an acquaintance of CHYTKA's and G.T.'s. In or about July, 2020, G.B. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. G.B. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 22, 2020, G.B. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. G.B. provided his PII to CHYTKA, including his Social Security Number and date of birth. CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 22, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on G.B.'s behalf.

e. Between on or about July 22, 2020 and on or about August 1, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of G.B. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid

debit card, CHYTKA made subsequent weekly re-certifications on G.B.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$5,560.00 being paid to the debit card assigned to G.B., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to G.B. CHYTKA and G.T. used the debit card for their benefit while occasionally providing cash and drugs to G.B.

h. On January 25, 2021, G.B. was interviewed by investigators while incarcerated at the SWVRJA-Abingdon. In a recorded interview, G.B. denied even knowing CHYTKA or G.T. Investigation determined this statement to be false. In a recorded interview, when questioned by investigators about G.B., CHYTKA said G.B. was present at her house and sat with her when she filed his information. CHYTKA explained G.B. was associated with G.T. through illicit drug activity.

40. J.C.

a. J.C. is an acquaintance of G.T.'s. In or about July 2020, J.C. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.C. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 7, 2020, J.C. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. J.C. provided his PII to CHYTKA, including his Social Security Number and date of birth. Although J.C.

was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 7, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.C.'s behalf.

e. Between on or about July 7, 2020 and on or about July 17, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of Joshua S. J.C. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.C.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the debit card assigned to J.C., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to J.C. CHYTKA and G.T. used the debit card for their benefit.

h. In a recorded interview, when questioned by investigators about J.C., CHYTKA said J.C. was present at her house and sat with her when she filed his information. CHYTKA explained J.C. was associated with G.T. through illicit drug activity and his fraudulent claim was filed as part of an illicit drug transaction.

41. K.C.

a. K.C. is a friend of CHYTKA's. In or about July 2020, K.C. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. K.C. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits.

c. On or about July 2, 2020, K.C. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. K.C. provided her PII to CHYTKA, including her Social Security Number and date of birth. Although K.C. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system. On or about July 13, 2020, CHYTKA attempted to file a claim with the VEC seeking pandemic unemployment assistance on K.C.'s behalf. At the time of the filing, the VEC website indicated an account in K.C.'s name had already been created.

d. The filing of this fraudulent claim resulted in not less than \$1,492.00 being paid to the debit card assigned to K.C. Because a card had been previously issued, CHYTKA and G.T. never received a newly issued card in K.C.'s name.

42. D.D.

a. D.D. is an acquaintance of CHYTKA's and G.T.'s and a relative of their landlord, M.H. In or about June 2020, D.D. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims. D.D. then sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

b. On or about June 26, 2020, D.D. provided his PII, including his Social Security Number and date of birth, to CHYTKA for the purpose of filing a

fraudulent claim. On or about June 26, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on D.D.'s behalf.

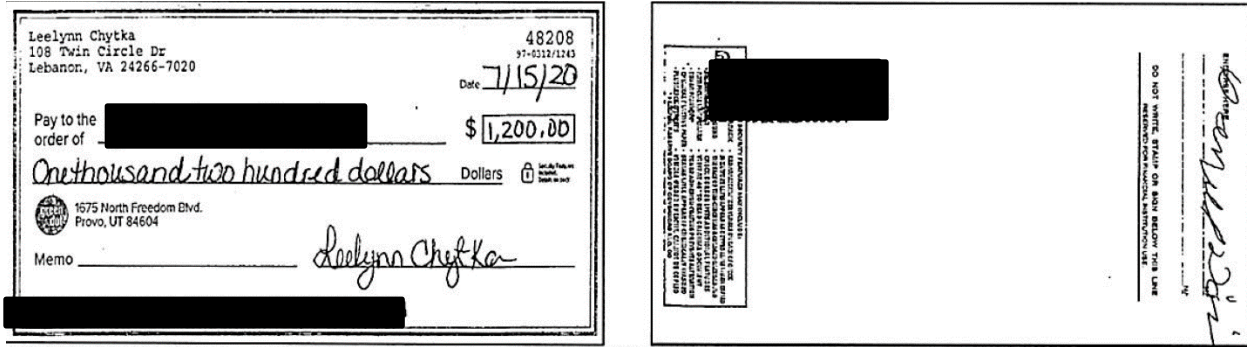
c. Between on or about June 26, 2020 and on or about July 5, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of D.D. at 108 Twin Circle Drive, Lebanon, VA 24266.

d. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on D.D.'s behalf.

e. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to the debit card assigned to D.D., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to D.D. In a recorded interview, CHYTKA told investigators she wrote D.D. a check in the amount of \$1,200.00 out of the funds received in his name. Thereafter, CHYTKA and G.T. used the debit card for their benefit.

f. In a recorded interview, D.D. denied having anything to do with providing his PII to CHYTKA for the purpose of filing a fraudulent claim. D.D. told investigators CHYTKA must have received his PII from documents left in the house in which she was living. Investigation determined this statement to be false.

g. A review of D.D.'s financial records indicate he did receive a monetary payment from CHYTKA in the amount of \$1,200.00, as CHYTKA told investigators.



h. In a recorded interview, M.H. also told investigators D.D. told her he received money from CHYTKA. M.H. also told investigators D.D. took a number of CHYTKA's personal belongings from 108 Twin Circle Drive because "she owed her money."

43. M.D.

a. M.D. is an acquaintance of CHYTKA's and G.T.'s, the sister of their landlord, M.H., and D.D.'s wife. M.D. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits. M.D. was incarcerated at all times relevant to this scheme. M.D.'s unemployment was due to her incarceration and not due to COVID-19.

b. In a recorded interview, CHYTKA explained that in or about July, 2020, M.D. provided her PII to D.D., including her Social Security Number and date of birth. D.D. then conveyed the PII to M.H., who then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on M.D.'s behalf.

c. On or about July 17, 2020, CHYTKA filed a claim with the VEC

seeking pandemic unemployment benefits on M.D.'s behalf.

d. Between on or about July 17, 2020 and on or about July 27, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of M.D. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on M.D.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to the debit card assigned to M.D., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to M.D. CHYTKA and G.T. used the debit card for their benefit until they were apprehended.

44. C.E.

a. C.E. is a friend of CHYTKA's. In or about July, 2020, C.E. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. C.E. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits.

c. On or about July 13, 2020, C.E. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. C.E. provided her PII to CHYTKA, including her Social Security Number and date of birth. Although C.E. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system. On or about July 13, 2020,

CHYTKA attempted to file a claim with the VEC seeking pandemic unemployment assistance on C.E.'s behalf. At the time of the filing, the VEC website indicated an account in C.E.'s name had already been created.

d. The filing of this fraudulent claim resulted in not less than \$1,785.00 being paid to the debit card assigned to C.E. Because a card had been previously issued, CHYTKA and G.T. never received a newly issued card in C.E.'s name.

45. E.G.

a. E.G. is an acquaintance of CHYTKA's and G.T.'s. In or about July, 2020, E.G. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. E.G. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 7, 2020, E.G. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. E.G. provided his PII to G.T., including his Social Security Number and date of birth. G.T. then provided E.G.'s information to CHYTKA, who entered the information and filed the claim due to her familiarity with the system.

d. On or about July 7, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on E.G.'s behalf.

e. Between on or about July 7, 2020 and on or about July 17, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit

card in the name of E.G. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on E.G.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the debit card assigned to E.G. including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to E.G. CHYTKA and G.T. used the debit card for their benefit.

h. E.G. was interviewed by investigators. E.G. told investigators "I had him (G.T.) file for my unemployment...but I didn't know nothing about it." E.G. went on to tell investigators G.T. told him they (G.T. and CHYTKA) were filing unemployment for a few people and "if he could get his stuff together, they'd file for mine." E.G. then told investigators G.T. contacted E.G.'s mother asking her to provide E.G.'s birth certificate and photo identification in order to get his money. E.G. told investigators his brothers, R.G. and C.M. both had G.T. file unemployment for them, and his brother C.M. "talked me into it, too." E.G. told investigators G.T. asked E.G. to give him \$500 of the money received.

i. Jailhouse video chats revealed that on January 27, 2021, in a recorded call to his mother, E.G. acknowledged to his mother "You know how Roo filed for my unemployment?"; "But I ain't eligible for unemployment..."; "I told them that (R.G.) was filing for his..."; "You better tell (R.G.) and Brown, both to watch it!" ("Brown" is a nickname for C.M.)

46. R.G.

a. R.G. is an acquaintance of CHYTKA's and G.T.'s. In or about July 2020, R.G. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. R.G. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 14, 2020, R.G. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. R.G. provided his PII to CHYTKA, including his Social Security Number and date of birth. Although R.G. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on R.G.'s behalf.

e. Between on or about July 15, 2020 and on or about July 25, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of R.G. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. The filing of this fraudulent claim resulted in not less than \$15,950.00 being paid to the debit card assigned to R.G., in both PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to R.G. CHYTKA and G.T. attempted to use the debit card for their own benefit, but the card was locked when they received it. \$15,192.00 was reclaimed by the VEC after fraudulent activity was detected.

47. J.H.

a. J.H. is an acquaintance of CHYTKA's. In or about June 2020, J.H. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.H. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about June 10, 2020, J.H. provided his PII, including his Social Security Number and date of birth, to M.E., who then conveyed the information to CHYTKA for the purpose of filing a fraudulent claim.

d. On or about June 10, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.H.'s behalf.

e. Between on or about June 10, 2020 and on or about June 20, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.H. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.H.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$17,530.00 being paid to the debit card assigned to J.H., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to J.H. CHYTKA and G.T. used the debit card for their benefit while occasionally providing cash to J.H.

48. M.H.

a. M.H. was CHYTKA's and G.T.'s friend and landlord. M.H. was

the property owner of 108 Twin Circle Drive.

b. In or about June 2020, CHYTKA and G.T. told M.H. she could receive free money by filing for pandemic unemployment benefits via the VEC. Based on this information, M.H. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits.

c. On or about June 3, 2020, M.H. provided her PII, including her Social Security Number and date of birth, to CHYTKA for the purpose of filing a fraudulent claim. On or about June 3, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on M.H.'s behalf.

d. Between on or about June 3, 2020 and on or about June 13, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of M.H. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on M.H.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$17,372.00 being paid to M.H., including PUA and LWAP payments.

g. In a recorded interview, M.H. told investigators she was aware CHYTKA filed a claim on her behalf but maintained she believed it to have just been "COVID relief." M.H. explained she believed she was eligible because she had a dependent under the age of 18. M.H. said both she and L.W. were on "full disability" and didn't really know what it was CHYTKA was signing them up for.

M.H. told investigators she assumed she was eligible, noting perhaps she was “ignorant” and she did not have a computer or a laptop. Investigation determined, however, M.H. had frequent internet access at all times relevant to this scheme.

h. M.H. told investigators she and L.W. stopped by 108 Twin Circle Drive in June 2020 and sat down with CHYTKA in her bedroom. M.H. said CHYTKA was on her computer reading questions off to M.H. M.H. provided answers to CHYTKA, including her Social Security Number, date of birth, and the last place M.H. was employed. M.H. admitted the last time she was employed was about 10 years ago. M.H. told investigators when CHYTKA was telling her about the program, she understood she would be ineligible if she was employed – the “COVID relief” was not relief for everyone, but only if you were unemployed due to the pandemic or with a disability. M.H. said even though CHYTKA told her the benefits were for people who were unemployed, it never clicked with her it was an “unemployment” benefit.

i. M.H. told investigators after her claim was approved CHYTKA gave M.H. a PayPal card in CHYTKA’s name. M.H. said CHYTKA told M.H. both M.H. and L.W.’s government benefits were both deposited into a single PayPal account under CHYTKA’s name.

j. M.H. told investigators she was present at 108 Twin Circle Drive when CHYTKA signed up D.D. M.H. admitted she told D.D. CHYTKA could sign him up for the benefits. M.H. told investigators CHYTKA kept putting D.D. off

regarding the money he should have received from his claim, and at some point, D.D. “helped himself to whatever he wanted” of CHYTKA’s property because he “felt like he was owed.” M.H. said at one point, CHYTKA wrote D.D. a check for “I think like \$1,000”.

k. In a recorded interview, CHYTKA told investigators once she filed her own claim for pandemic unemployment benefits, M.H. and L.W. asked CHYTKA if she would file a claim for them. CHYTKA explained she did file for M.H. and let M.H. use her PayPal account initially before PayPal shut down the account.

49. W.H.

a. W.H. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. W.H. was incarcerated at all times relevant to this scheme. W.H.’s unemployment was due to his incarceration and not due to COVID-19.

b. In or about July 2020, W.H. provided his PII to J.T., including his Social Security Number and date of birth. J.T. provided the PII to CHYTKA so she could file a fraudulent claim for on W.H.’s behalf.

c. On or about July 17, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on W.H.’s behalf.

d. Between on or about July 17, 2020 and on or about July 27, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of W.H. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on W.H.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to the pre-paid debit card assigned to W.H. CHYTKA and G.T. did not, however, provide the debit card to W.H. CHYTKA and G.T. used the debit card for their benefit until they were apprehended, and occasionally sent money to W.H.'s commissary account in jail.

g. On December 10, 2020, after J.T. was released from jail, J.T. confirmed he was in possession of W.H.'s unemployment benefits in an email sent to W.H. In response to this email on December 10, 2020, W.H. demonstrated his understanding of the object of the scheme, and his desire to receive the money.

Jeff Tackett		12/10/2020 5:05AM
Yo whats up dawg. Ay...		
Yo whats up dawg. Aye i got some bread for you call. Me when you get this and I got some even better news. My brother did get your unemployment shit but I took that shit and I can reset it and get you like 600 back by Monday I just need your ss# call me [REDACTED]		
[REDACTED]	Jeff Tackett	12/10/2020 6:19AM
RE: Yo whats up dawg. Ay...		
yooo, watsup broski, hah yeah i figured he did bro, but shit yeah ill call u bro my out time at 2:30 today im in max im tray server bak here i'll call u bro what u been doin man? u aight, shit be carful out there bro, streets r fukin trippy, hah but yeah bro i could use some bread real shit, ill shoot u a name love u bro, -Wiggy [REDACTED] keep ya head up..		
Pop out at ya party im with the gang, hah		

50. J.H.

a. J.H. is an acquaintance of CHYTKA's and G.T.'s. In or about June 2020, J.H. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.H. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about June 14, 2020, J.H. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA. J.H. provided his PII to CHYTKA, including his Social Security Number and date of birth. Although J.H. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.H.'s behalf.

e. Between on or about June 14, 2020 and on or about June 24, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.H. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.H.'s behalf.

g. The filing of this fraudulent PUA claim resulted in not less than \$16,488.00 being paid to the debit card assigned to J.H., in PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to J.H. CHYTKA and G.T. used the debit card for their benefit while occasionally providing cash to J.H.

51. T.H.

a. T.H. is an acquaintance of CHYTKA's. In or about July 2020, T.H. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing

fraudulent claims.

b. T.H. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 7, 2020, T.H. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. T.H. provided his PII to CHYTKA, including his Social Security Number and date of birth. Although T.H. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 7, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on T.H.'s behalf.

e. Between on or about July 7, 2020 and on or about July 17, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of T.H. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on T.H.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$16,898.00 being paid to T.H., in PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to T.H. CHYTKA and G.T. initially used the debit card for their benefit. In exchange for this, G.T. received controlled substances from T.H. and gave cash to T.H.

52. A.J.

a. A.J. is a friend of G.T.'s and J.T.'s. In or about June 2020, A.J.

was incarcerated with J.T. when he became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. A.J. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. A.J.'s unemployment was due to his incarceration and not due to COVID-19.

c. On June 11, 2020, A.J. was released from jail. Upon his release, A.J. was picked up by CHYTKA and G.T. and taken to 108 Twin Circle Drive, Lebanon, VA 24266. On or about June 12, 2020, A.J. provided his PII, including his Social Security Number and date of birth, to CHYTKA for the purpose of filing a fraudulent claim.

d. On or about June 12, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on A.J.'s behalf.

e. Between on or about June 12, 2020 and on or about June 22, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of A.J. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on A.J.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$18,162.00 being paid to the pre-paid debit card assigned to A.J., including PUA and LWAP payments. CHYTKA and G.T. did not initially provide the debit card to A.J. CHYTKA and G.T. used the debit card for their benefit. In exchange, CHYTKA and G.T. provided A.J. a vehicle and cash on several occasions.

CHYTKA and G.T. eventually gave A.J. the debit card assigned to him.

h. A.J. was interviewed by investigators in January 2021 while A.J. was incarcerated. A.J. told investigators he heard about the unemployment scheme from J.T. when he was in jail with J.T. A.J. told investigators J.T. was speaking with people in the pod about getting them a “big sum of money” if they gave him their Social Security Number and birth date.

i. A.J. admitted after he was released from jail on June 11, 2020, CHYTKA filed his unemployment for him. A.J. told investigators after CHYTKA filed his unemployment, G.T. told him he “only got back \$3,500”, which was what A.J. received. A.J. told investigators the arrangement he had with CHYTKA and G.T. was A.J. paid them \$500 in exchange for them filing his unemployment. A.J. said G.T. paid him \$3,000 in cash a couple of weeks after they filed, but he then used that money to buy a car from G.T. A.J. admitted that a week or two later, he received a pre-paid debit card that received weekly unemployment payments, which he continued to use until he was again incarcerated.

53. J.J. Jr.

a. J.J. Jr. is a friend of G.T.’s and J.T.’s. In or about June 2020, J.J. Jr. was incarcerated with J.T. when he became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.J. Jr. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.J. Jr. was incarcerated when his claim was initially filed. J.J. Jr.’s unemployment was

due to his incarceration and not due to COVID-19.

c. In or about June 2020, J.J. Jr. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed that PII to CHYTKA so she could file a fraudulent claim on J.J. Jr.'s behalf.

d. On or about June 24, 2020, CHYTKA filed a claim for pandemic unemployment benefits with the VEC on J.J. Jr.'s behalf.

e. Between on or about June 24, 2020 and on or about July 2, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.J. Jr. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly PUA deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.J. Jr.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$14,434.00 being paid to the pre-paid debit card assigned to J.J. Jr., in PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.J. Jr. In exchange, CHYTKA and G.T. provided J.J. Jr. cash on several occasions. CHYTKA and G.T. attempted to use the debit card for their benefit, but the card was locked.

54. J.J. Sr.

a. J.J. Sr. (J.J. Sr.) is a friend of G.T.'s and J.T.'s. J.J. Sr. is A.J.'s and J.J. Jr.'s father. In or about June 2020, J.J. Sr. was incarcerated with J.T. when he became aware of the scheme by which CHYTKA, G.T., and J.T. were

filing fraudulent claims.

b. J.J. Sr. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.J. Sr. was incarcerated when his claim was initially filed. J.J. Sr.'s unemployment was due to his incarceration and not due to COVID-19.

c. In or about June 2020, J.J. Sr. provided his PII to J.T., including his Social Security Number, date of birth, and mother's maiden name. J.T. then conveyed that PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on J.J. Sr.'s behalf.

d. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.J. Sr.'s behalf.

e. Between on or about June 14, 2020 and on or about June 24, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.J. Sr. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the pre-paid debit card assigned to J.J. Sr., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.J. Sr. CHYTKA and G.T. used the debit card for their benefit. In exchange, CHYTKA and G.T. provided J.J. Sr. cash on several occasions. CHYTKA and G.T. also provided J.J. Sr. a Chevy S10 truck.

g. J.J. Sr. was interviewed by investigators on January 25, 2021 while he was incarcerated at SWVRJA-Duffield. J.J. Sr. admitted he had

previously been incarcerated in pod 4A at SWVRJA-Duffield along with J.T. and others. J.J. Sr. said in May 2020, J.T. spoke with several people in the pod, and J.T. was going through his brother, G.T., to get unemployment. J.J. Sr. said the whole pod was sitting around discussing the fraudulent unemployment claims with J.T.

h. J.J. Sr. told investigators “it was possible” he provided J.T. with his PII and allowed J.T. to try to file for his unemployment, but he couldn’t remember for sure. J.J. Sr. then told investigators when J.T. asked him if he wanted to file for unemployment, he said “sure, go ahead.” He later told investigators he did indeed provide his PII to J.T. J.J. Sr. said he never saw any of the money from the claim before J.T. approached J.J. Sr. sometime in December after J.T. got out of jail. It was at that point that J.T. provided J.J. Sr. with his pre-paid debit card.

i. J.J. Sr. said after he was released from jail in June 2020, he saw G.T. with a stack of debit cards, including his card. J.J. Sr. said G.T. gave him his pre-paid debit card at that time, but the card did not work. Months later, in December, J.T. gave J.J. Sr. a new card.

55. R.J.

a. R.J. is an acquaintance of G.T.’s. In or about July 2020, R.J. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. R.J. sought to obtain pandemic unemployment benefits even

though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 1, 2020, R.J. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. R.J. provided his PII to CHYTKA, including his Social Security Number, birth date, and his favorite sports team (used for the purpose of a security question). Although R.J. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 1, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on R.J.'s behalf. At the time of this filing, R.J. already had a state-issued debit card due to disability payments that were received by R.J.

e. The filing of this fraudulent claim resulted in not less than \$11,228.00 being paid to the debit card assigned to R.J., in PUA and LWAP payments. In exchange for this, G.T. provided controlled substances to R.J.

f. R.J. was interviewed by investigators on January 25, 2021 while he was incarcerated at the SWVRJA-Abingdon. R.J. admitted to investigators he knows G.T. through illicit drug activity. R.J. admitted he occasionally went to G.T.'s house in order to purchase drugs.

g. R.J. told investigators he learned about G.T. filing fraudulent claims when he was with C.M. R.J. was present when G.T. approached C.M. and others and asked them to give him their personal information to file for unemployment.

h. R.J. admitted he knew of people filing for unemployment through G.T. but denied providing his PII to G.T. or CHYTKA. Investigation determined this statement to be false. During the interview, R.J. told investigators his favorite NFL team is the L.A. Raiders. A review of the VEC's records indicates the security question related to R.J.'s application was "What is your all-time favorite sports team?" The answer provided to this question was "Raiders".

i. When interviewed, CHYTKA told investigators R.J. provided his information to her to file a fraudulent claim. CHYTKA told investigators when she filed the claim, the VEC website indicated R.J. already had a card issued to him for state benefits.

j. R.J. also told investigators he was present when C.M.'s brothers, A.G. and R.G., were discussing fraudulent claims with G.T. R.J. told investigators R.G. said G.T. was withholding his unemployment money because R.G. owed G.T. money for drugs.

56. M.K.

a. M.K. is a friend of CHYTKA's. In or about June 2020, M.K. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. M.K. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits.

c. On or about June 14, 2020, M.K. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. M.K. provided her PII to

CHYTKA, including her Social Security Number and date of birth. Although M.K. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on M.K.'s behalf.

e. Between on or about June 14, 2020 and on or about June 24, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of M.K. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on M.K.'s behalf.

g. The filing of this fraudulent claim resulted in not less than \$17,688.00 being paid to the pre-paid debit card assigned to M.K., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to M.K. CHYTKA and G.T. used the debit card for their benefit while occasionally providing cash to M.K.

57. J.M.

a. J.M. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.M. was incarcerated at all times during this scheme. J.M.'s unemployment was due to his incarceration and not due to COVID-19.

b. In or about June 2020, J.M. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed the PII to CHYTKA

so she could file a fraudulent claim for pandemic unemployment benefits on J.M.'s behalf.

c. On or about June 29, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.M.'s behalf.

d. Between on or about June 29, 2020 and on or about July 8, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.M. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.M.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$10,928.00 being paid to the pre-paid debit card assigned to J.M., in PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.M. CHYTKA and G.T. used the debit card for their benefit until they were apprehended.

g. In a recorded jailhouse telephone call on July 22, 2020, J.M. told A.J. "Look - I don't know if you knew or not but I gave (J.T.) my info to give to Dannielle (CHYTKA) to get that fucking money sent like they be doing, you know what I'm saying? Before (J.T.) got sent to max, or the SHU or whatever, before he got in that fight, he said they got my card or whatever but was waiting on a fucking pin number. So I need you to check on that shit for me." A.J. responded with "Oh I got you, I will."

58. C.M.

a. C.M. is a friend of G.T.'s and J.T.'s and the brother of E.G. and R.G. In or about July 2020, C.M. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. C.M. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 1, 2020, C.M. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. C.M. provided his PII to CHYTKA, including his Social Security Number and date of birth. Although C.M. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. On or about July 1, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on C.M.'s behalf.

e. Between on or about July 1, 2020 and on or about July 10, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of C.M. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on C.M.'s behalf.

g. The filing of this fraudulent PUA claim resulted in not less than \$17,104.00 being paid to the debit card assigned to C.M., in PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to C.M. CHYTKA and G.T. used the debit card for their benefit. In exchange for this, CHYTKA and G.T. provided cash on several occasions to C.M. and G.T. provided controlled

substances to C.M.

h. Jailhouse video chats revealed that on January 27, 2021, in a recorded call to his mother, E.G. acknowledged to his mother “You know how Roo filed for my unemployment?”; “But I ain’t eligible for unemployment...”; “I told them that (R.G.) was filing for his...”; “You better tell (R.G.), and Brown, both to watch it!” (“Brown” is a nickname for C.M.) In response to this, E.G.’s mother (also C.M.’s mother) responded with “Brown’s filing for his again!”

59. D.M. Jr.

a. D.M. Jr. is G.T.’s and J.T.’s uncle. In or about June 2020, D.J. Jr. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims. D.M. Jr. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

b. On or about June 27, 2020, D.M. Jr. D.M. Jr. provided his PII to V.M. to provide to CHYTKA and G.T., including his Social Security Number and birth date. CHYTKA attempted to file a fraudulent claim for pandemic unemployment benefits on D.M. Jr.’s behalf, but the VEC website indicated he had been issued a card. The filing of this fraudulent claim resulted in not less than \$18,162.00 being paid to the debit card assigned to D.M. Jr., in PUA and LWAP payments.

60. E.B.

a. E.M. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. E.M.

was incarcerated at all times during this scheme. E.M.'s unemployment was due to his incarceration and not due to COVID-19.

b. In or about July 2020, E.M. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on E.M.'s behalf.

c. On or about July 22, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on E.M.'s behalf.

d. Between on or about July 22, 2020 and on or about July 31, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of E.M. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on E.M.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$4,454.00 being paid to the pre-paid debit card assigned to E.M., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to E.M. CHYTKA and G.T. used the debit card for their benefit until they were apprehended.

g. In a jailhouse telephone call on July 21, 2020, E.M. demonstrated his understanding of the object of the scheme, and his willing participation in the scheme when he told a woman:

“you know that Danielle CHYTKA bitch? J.T.’s girl? Alright – look –

that bitch has got my information, she's got like \$1,300.00 of Brian's, so she's probably got all my money too. You need to get a hold of that bitch and tell her that you want our fucking money....she's got all of my shit doin' that unemployment..."

h. In a separate jailhouse call, E.M. told this same woman to get in touch with CHYTKA and to tell her he "wants his fucking money", and he knows his application was accepted because they sent him \$100.

61. J.M.

a. J.M. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.M. was incarcerated at all times during this scheme. J.M.'s unemployment was due to his incarceration and not due to COVID-19.

b. In or about June 2020, J.M. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on J.M.'s behalf.

c. On or about June 25, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.M.'s behalf.

d. Between on or about June 25, 2020 and on or about July 3, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.M. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.M.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$11,686.00 being paid to the debit card assigned to J.M., in PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.M. CHYTKA and G.T. used the debit card for their benefit until they were apprehended. Occasionally, CHYTKA sent money to inmates' commissary accounts for J.M.'s use.

g. Investigators interviewed J.M. on January 11, 2021 while J.M. was incarcerated at SWVRJA-Duffield. During this interview, J.M. admitted to providing his PII to J.T., but maintained he was only trying to get his "stimulus check." Investigation determined this statement to be false.

h. In December 2020, after J.T. was released from jail, J.T. confirmed he was in possession of J.M.'s unemployment benefits in an email sent to J.M. on December 10, 2020. In response to this email on December 10, 2020, J.M. demonstrated his understanding of the object of the scheme, and his willing participation in the scheme.

Jeff Tackett Hey I got your unemp... Hey I got your unemployment shitt roo had it and I need your ss# to get into your account . i got you dawwwggg cause real is rare . love ya bro call me	[REDACTED] 12/10/2020 5:54AM
[REDACTED] RE: Hey I got your unemp... [REDACTED] thats it bro real is rare and you def. keeping it 100 luv you man f you around the way tonight make that happin I need you to call Bird and heel tell you watsup [REDACTED] and I got you bro my word	Jeff Tackett 12/10/2020 6:28PM

62. S.M.

a. S.M. sought to obtain pandemic unemployment benefits even

though, as he then well knew, he was not eligible to receive such benefits. S.M. was incarcerated at all times during this scheme. S.M.'s unemployment was due to his incarceration and not due to COVID-19.

b. In or about July, 2020, S.M. provided his PII to J.T., including his Social Security Number and date of birth. J.T. then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on S.M.'s behalf.

c. On or about July 23, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on S.M.'s behalf.

d. Between on or about July 23, 2020 and on or about July 31, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of S.M. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on S.M.'s behalf.

f. The filing of this fraudulent PUA claim resulted in not less than \$7,866.00 being paid to the debit card assigned to S.M., including PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to S.M. CHYTKA and G.T. used the debit card for their benefit.

g. In a recorded jailhouse telephone call on January 25, 2021, S.M. admitted to providing his PII to J.T. and "trusting a friend".

63. V.M.

a. V.M. is G.T.'s and J.T.'s mother. In or about June 2020, V.M.

became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. V.M. sought to obtain pandemic unemployment benefits even though, as she then well knew, she was not eligible to receive such benefits. V.M. had been unemployed for years due to physical disability prior to filing for fraudulent claims. V.M.'s unemployment was not due to the COVID-19 pandemic.

c. On or about June 26, 2020, V.M. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. V.M. provided her PII to CHYTKA and G.T., including her Social Security Number and birth date. Although V.M. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. Between on or about June 26, 2020 and on or about July 10, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of V.M. at 108 Twin Circle Drive, Lebanon, VA 24266. Despite the receipt of this debit card, CHYTKA elected to have pandemic unemployment benefits deposited directly to V.M.'s bank account.

e. In order to continue to receive weekly deposits to V.M.'s bank account, CHYTKA made subsequent weekly re-certifications on V.M.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to V.M., including PUA and LWAP payments.

g. V.M. was interviewed by investigators on January 15, 2021 at the

United States Attorney's Office in Abingdon, Virginia. During this interview, V.M. told investigators the following:

h. V.M. learned about the pandemic unemployment benefits from CHYTKA. V.M. initially tried to file for pandemic unemployment benefits on her own, but could not seem to get past the first part of the application. After that, she went to 108 Twin Circle Drive, Lebanon, Virginia where CHYTKA helped her file the claim.

i. V.M. maintained she believed she was legitimately eligible for pandemic unemployment benefits. V.M. described for investigators she had been self-employed "during the summer months – during the warmer months" when she knocked on doors and passed out flyers asking people if they wanted their homes washed, or other odd jobs, calling it a "1099 job". V.M. then maintained CHYTKA told her the claim for pandemic unemployment benefits was legitimate. V.M. maintained she did not know CHYTKA was filing claims fraudulently until right before Christmas. Investigation determined these statements to be false.

j. In a recorded interview, CHYTKA told investigators that to her knowledge, V.M. had not been employed and received a check from the state (disability). CHYTKA told investigators she did not believe V.M. was eligible for unemployment "...because I don't think she worked, um, and I'm pretty sure – like I said – she drew a social security check." In the same interview, CHYTKA told investigators everyone for whom she filed knew the claims were fraudulent.

k. A recorded jailhouse telephone call between V.M. and her son, G.T. revealed the exchange outlined in paragraph 35(i), above. During this conversation, G.T. told his mother he lied to federal investigators in order to cover up for V.M.

l. In a separate recorded jailhouse telephone call from Greg TACKET to V.M.'s father, D.L.M. Sr., on February 18, 2021 G.T. says (referring to V.M.):

"...I swear to God, man, I, uh – I guarantee it, Mom fuckin', ooh...oh, and truth be known, fuckin', she's like fuckin' tryin' to pawn it off on Danielle (CHYTKA) like Danielle did something. Bitch – you knew exactly what was...she's got me fuckin' heated, PawPaw... everything that comes out of her mouth is a goddamn lie."

m. During her interview with investigators, V.M. also maintained it really started to hit her the claims for unemployment were fraudulent only after CHYTKA was incarcerated in December and when V.M. came across a monetary determination letter with her father's name on it. Investigation determined this statement to be false. Later in the same interview, V.M. also told investigators she "might have" given her father's Social Security Number to CHYTKA for the purpose of filing a claim for pandemic unemployment benefits. V.M. then said she told CHYTKA not to file for D.M. Sr. V.M. later admitted she *did* provide CHYTKA with her father's Social Security Number to file a claim.

n. V.M. told investigators she had no knowledge about D&R Accounting, or any accounting business being run out of 108 Twin Circle Drive. Investigation determined this to be false. In a recorded jailhouse telephone call

between G.T. and V.M., G.T. began talking about how when they filed claims, they did it under the accounting company. V.M. interrupted G.T., saying “...watch what you say...” Later in the same interview, V.M. described a business CHYTKA and G.T. were running out of their home where CHYTKA “was filing unemployment claims and just things like that.”

o. During the interview, V.M. admitted she was trying to help CHYTKA and G.T. sell vehicles they owned, vehicles that had been purchased since the unemployment scheme began. V.M. also admitted to attempting to delete J.T.’s Facebook accounts after J.T. asked her to delete the accounts.

64. P.P.

a. P.P. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. P.P. was incarcerated at all times during this scheme. P.P.’s unemployment was due to his incarceration and not due to COVID-19.

b. In or about June 2020, P.P. solicited PII from a friend in order to file a claim for pandemic unemployment benefits on her behalf. An email to this friend sent while P.P. was incarcerated demonstrates his knowledge of the scheme and his intent to file a fraudulent claim.

[REDACTED] [REDACTED] 06/28/2020 4:29PM
RE: What do you need fro...
will you put some money tomorrow morning if possible and i need your maiden name full?

[REDACTED] [REDACTED] 06/28/2020 4:32PM
Are you sure it is n...
Are you sure it is not a scam I have not heard of any help that would require your moms maiden name where is this thru? Don't want you to be took anyway ok

[REDACTED] [REDACTED] 06/29/2020 7:22AM
RE: Pat I have not heard...
its unemployment. It is a bussiness owner thats doing it. i will tell you more later give you the info. please send me some money this morning and ill call you.

c. In or about July 2020, P.P. again solicited assistance from this friend to file a fraudulent claim on his behalf. An email to this friend sent while P.P. was incarcerated demonstrates his knowledge of the scheme and his intent to file a fraudulent claim.

[REDACTED] [REDACTED] 07/16/2020 3:35PM
unemployment
sign me up on an unemployment claim. you can claim under the table jobs i was mowing 400 a week. if it says i have an account it would be [REDACTED]@gmail.com [REDACTED]
[REDACTED] but put it in everyone is getting it

d. In or about July 2020, P.P. provided his PII to J.T., including his Social Security Number and date of birth. J.T. provided the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on P.P.'s behalf.

e. On or about July 5, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on P.P.'s behalf.

f. Between on or about July 5, 2020 and on or about July 15, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of Patrick A. P.P. at 108 Twin Circle Drive, Lebanon, VA 24266.

g. The filing of this fraudulent claim resulted in not less than \$1,422.00 in PUA payments being paid to the pre-paid debit card assigned to P.P. CHYTKA and G.T. did not, however, provide the debit card to P.P.

65. J.P.

a. J.P. is a friend of G.T.'s and J.T.'s. In or about July, 2020, J.P. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.P. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

c. On or about July 15, 2020, J.P. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. J.P. provided his PII to CHYTKA, including his Social Security Number and date of birth.

d. On or about July 1, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.P.'s behalf.

e. Between on or about July 1, 2020 and on or about July 10, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.P. at 108 Twin Circle Drive, Lebanon, VA 24266.

f. The filing of this fraudulent PUA claim resulted in not less than \$916.00 being paid to the debit card assigned to J.P., in PUA and LWAP payments. CHYTKA and G.T. did not provide the debit card to J.P. CHYTKA and G.T. used the debit card for their benefit. In exchange for this, CHYTKA and G.T. provided controlled substances to J.P.

66. J.S.

a. J.S. is J.T.'s friend. In or about June, 2020, J.S. became aware of the scheme by which CHYTKA, G.T., and J.T. were filing fraudulent claims.

b. J.S. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.S. had been unemployed for several months due to a drug addiction and his unemployment was unrelated to COVID-19. J.S. had been unemployed since 2019, predating the COVID-19 pandemic.

c. On or about June 2, 2020, J.S. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. J.S. provided his PII to CHYTKA and G.T., including his Social Security Number, birth date, and his pet's name (used for a security question). Although J.S. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

d. Between on or about June 2, 2020 and on or about June 12, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.S. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.S.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$6,876.00 being paid to the debit card assigned to J.S., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to

J.S. CHYTKA and G.T. used the debit card for their benefit until they were apprehended.

g. In December 2020, J.T. took possession of several pre-paid debit cards that had been issued as part of this scheme. J.T. provided J.S. with his card in December 2020. On January 5, 2021, J.S. was apprehended on unrelated charges, and was found in possession of the Mastercard pre-paid debit card with his name on it.

h. J.S. was interviewed by investigators on January 12, 2021 while he was incarcerated at the SWVRJA-Duffield. J.S. admitted to knowingly filing a fraudulent claim for pandemic unemployment benefits through CHYTKA and G.T. J.S. admitted that in June 2020, J.S. went to 108 Twin Circle Drive, Lebanon, Virginia and sat down with CHYTKA while she filed a claim on his behalf.

i. J.S. admitted he had not been working in 2020 other than doing an odd job here and there. J.S. admitted he provided his Social Security Number, date of birth, and other information as was required for CHYTKA to file the claim. J.S. admitted he planned to give CHYTKA and G.T. some of the money he received through the fraudulent claim, "at least 10%." J.S. admitted in December 2020, he was in a Chevy Tahoe with J.T. when he saw at least 50 debit cards he believed to be associated with the scheme.

67. L.W.

a. L.W. is CHYTKA's and G.T.'s friend, and M.H.'s fiancé. M.H. was the property owner of 108 Twin Circle Drive and served as CHYTKA's and G.T.'s

landlord. In or about June 2020, CHYTKA and G.T. told L.W. he could receive free money by filing for pandemic unemployment benefits via the VEC. Based on this information, L.W. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

b. On or about June 8, 2020, L.W. provided PII, including his Social Security Number and date of birth, to CHYTKA for the purpose of filing a fraudulent claim. On or about June 8, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on L.W.'s behalf.

c. Between on or about June 8, 2020 and on or about June 20, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of L.W. at 108 Twin Circle Drive, Lebanon, VA 24266.

d. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on L.W.'s behalf.

e. The filing of this fraudulent PUA claim resulted in not less than \$17,372.00 being paid to L.W., including PUA and LWAP payments.

f. L.W. was interviewed by investigators and said he and M.H. stopped by 108 Twin Circle Drive back in June 2020 for the purpose of checking on the house and making sure the trash had been taken out. L.W. said when they entered the property, CHYTKA was sitting on her bed in her bedroom. L.W. said CHYTKA told him he would be eligible for some sort of "pandemic relief" and she could sign him up. L.W. noted he wasn't sure what it was and he "doesn't have a computer, doesn't even know how to get on a computer." Investigation

determined, however, that M.H. and L.W. had frequent internet access at all relevant times during this scheme.

g. L.W. maintained CHYTKA told him he was eligible for the benefits due to his being disabled, even though L.W. received full disability payments at all relevant times during this scheme. L.W. admitted providing his PII to CHYTKA for the purpose of filing what he said he thought was “pandemic relief.” L.W. said CHYTKA offered to sign him up, and he assumed he was eligible.

h. L.W. told investigators he provided his PII to CHYTKA, including his Social Security Number, date of birth, mother’s maiden name, and other information. L.W. admitted he had been disabled for years, and last worked in the coal mines years before.

i. L.W. told investigators that after the claim was approved, CHYTKA gave them (L.W. and M.H.) a PayPal card in CHYTKA’s name, and said CHYTKA told L.W. he could use her card until their own card came in.

j. In a recorded interview, CHYTKA told investigators once she filed her own claim for pandemic unemployment benefits, L.W. and M.H. asked CHYTKA if she would file a claim for them. CHYTKA explained she did file for M.H. and L.W. and let them use her PayPal account initially before PayPal shut down the account. CHYTKA told investigators M.H. eventually had the PayPal account switched to where both L.W. and M.H. could access the card. L.W. admitted to investigators M.H. eventually received a PayPal card in her name, and he and M.H. both used the card.

k. L.W. told investigators that after CHYTKA gave M.H. a PayPal card with CHYTKA's name on it, L.W. started to think something was "fishy".

68. J.W.

a. J.W. sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. J.W. was incarcerated at all times during this scheme. J.W.'s unemployment was due to his incarceration and not due to COVID-19.

b. In or about June 2020, J.W. provided his PII to J.T., including his Social Security Number and date of birth. J.T. provided the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on J.W.'s behalf.

c. On or about June 27, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on J.W.'s behalf.

d. Between on or about June 27, 2020 and on or about July 10, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of J.W. at 108 Twin Circle Drive, Lebanon, VA 24266.

e. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on J.W.'s behalf.

f. The filing of this fraudulent claim resulted in not less than \$11,844.00 being paid to the pre-paid debit card assigned to J.W., including PUA and LWAP payments. CHYTKA and G.T. did not, however, provide the debit card to J.W. CHYTKA and G.T. used the debit card for their benefit until they

were apprehended.

g. J.W. was interviewed by investigators on January 12, 2021 while he was incarcerated at the SWVRJA-Duffield. J.W. initially denied any knowledge of anyone filing for pandemic unemployment benefits. J.W. maintained he had never spoken with anyone about unemployment benefits and expressly denied speaking with J.T. about unemployment benefits. Investigation determined these statements to have been false.

h. J.W. said he did not file for unemployment because he “was not entitled to it because he hadn’t had a job in recent years.”

i. On December 10, 2020, after J.T. was released from jail, J.T. confirmed he was in possession of J.W.’s unemployment benefits in an email sent to J.W. In response to this email on December 11, 2020, J.W. demonstrated his understanding of the object of the scheme, and his willing participation in the scheme.

Communications with Tackett , Jeff, Jtackett91@yahoo.com

Jeff Tackett

12/10/2020 6:00AM

Yo my bro got you un...

Yo my bro got you unemployment I know we had our lil problem but if you want ya money i got you I need your ss# d.o.b

Jeff Tackett

12/11/2020 8:37AM

RE: Yo my bro got you un...

j. Investigators confronted J.W. with this email exchange. J.W. initially denied sending this email, saying he was not familiar with the email and

the facility had a history of people hacking into his email and sending things from his email. Investigation determined these statements to be false.

k. J.W. eventually changed his story. J.W. told investigators he *had* discussed unemployment with J.T. in June or July 2020, and J.W. provided his PII to J.T. for the purpose of filing a claim. J.W. said J.T. agreed to use his girlfriend to help J.W. check on the status of his stimulus check, and they would then try to get J.W. unemployment benefits as well. J.W. said he provided J.T. with his charge papers, which included his full name, date of birth, and Social Security Number.

l. J.W. explained he and J.T. agreed if J.T. and CHYTKA filed for his unemployment, they could keep a portion of the money. J.W. told investigators J.T. “got the whole pod.” J.W. said he previously resided in pod 4A, and the unemployment scheme was common knowledge to everyone in the pod. J.W. described how they sat around and discussed the unemployment claims with each other in the pod. J.W. then discussed a number of other inmates in the pod with him who also signed up for pandemic unemployment benefits.

AGGRAVATED IDENTITY THEFT ACTS

69. Aggravated Identity Theft of J.E.S.

a. One of the thirty-nine (39) pandemic unemployment claim applications using the address of 108 Twin Circle Drive, Lebanon, Virginia 24266 was filed in the name and Social Security Number of J.E.S. At all times relevant to this investigation, J.E.S. was an inmate at the SWVRJA-Duffield facility.

b. When interviewed by investigators, J.E.S. denied any knowledge of any application for unemployment benefits. J.E.S. seemed confused by questions about unemployment and stated the only thing he ever applied for was his *stimulus check* – that he had filled out a form and mailed it to the IRS seeking his stimulus payment.

c. Emails sent by J.E.S. to family and friends show that as early as April, 2020 (before CHYTKA's scheme began), J.E.S. sought assistance from friends and family members in having his federal *stimulus check* mailed to them.

d. Jailhouse phone calls reveal that in July, 2020, J.E.S. continued to speak with family and friends about receiving his stimulus check. In one call, J.E.S. states his "celly" (cellmate, J.T.) *"has his girl looking into my stimulus check"*.

e. Emails sent by inmate J.T. to CHYTKA corroborate J.T. was seeking to assist his cellmate, J.E.S. in tracking down the status of J.E.S.'s stimulus check. On July 4, 2020 J.T. emailed CHYTKA stating: *"...and Imk about smith's stimulas check he needs it ASAP..."*. In response, CHYTKA said *"I checked on his and it says there's no payment info available. I need the last address that he put down the last time he filed taxes."* In subsequent emails, J.T. provided J.E.S.'s Social Security Number, date of birth, and two addresses in Norton, Virginia. In a follow-up email, J.T. again stated *"he (Smith) wants his stimulas check sent to (full address listed in the email), Norton VA."* The address J.T. provided was the same address as J.E.S. previously discussed with his

family members to receive his *stimulus check*.

f. Notably, throughout this email exchange, J.T. consistently referred to J.E.S.'s *stimulus* and did not refer to unemployment when communicating about J.E.S. For other inmates, J.T. commonly referred to "unemployment" when communicating with CHYTKA.

g. Jailhouse telephone calls reveal that on July 23, 2020, J.T. called G.T. and CHYTKA. During this call, J.T. told G.T. and CHYTKA that J.E.S. needed help with his *stimulus check*. During the same telephone call, J.E.S. got on the telephone and spoke directly with G.T. and CHYTKA. G.T. told J.E.S. he needed J.E.S.'s name, Social Security Number, date of birth, and the address he last filed taxes with. CHYTKA then advised J.E.S. his *stimulus check* would be sent to his last address if he did not have direct deposit. In response, J.E.S. told G.T. and CHYTKA he would have to get back to them with his last known address. J.T. then got back on the phone with G.T. and CHYTKA, confirmed J.E.S. was his "celly", and reiterated J.E.S. "...needs his *stimulus check*." G.T. then asked J.T., "*What about his other thing?*" (referring to unemployment). In response, J.T. said, "*You can do that, he don't know nothing about that.*" G.T. and CHYTKA both respond by saying "*oh ok*". J.T. then told G.T. that CHYTKA should have been the one on the phone speaking with J.E.S., to which CHYTKA responded, "*I was – I did talk!*" J.T. then told CHYTKA and G.T. it would be difficult for J.T. to get J.E.S.'s Social Security Number, because "...they're already suspect of the whole givin' out Social Security Number thing, because

I've been in here tryin', you know, you know me, I'm in here...like can i get that number?...let me get that shit."

h. Jailhouse telephone calls reveal that later on July 23, 2020, J.T. called back to CHYTKA and G.T. During this second telephone call, J.E.S. again got on the telephone with CHYTKA and G.T. J.E.S. provided CHYTKA with his full name, Social Security Number, date of birth, and the address he used on his last tax filing. CHYTKA then told J.E.S. it was "*probably a paper check*" that had been sent, and she'd look into it (referring to his stimulus check).

i. On July 24, 2020, CHYTKA filed a fraudulent claim for pandemic unemployment benefits in the name and identify of J.E.S. The claim again used CHYTKA's 108 Twin Circle Drive address and CHYTKA's telephone number. After filing the fraudulent claim for pandemic unemployment benefits in J.E.S.'s name, CHYTKA and G.T. received via United States Postal a prepaid debit card in J.E.S.'s name at 108 Twin Circle Drive, Lebanon Drive, 24266. The card was never provided to J.E.S. J.E.S. never authorized the use of his personal information for the purpose of filing a claim for pandemic unemployment benefits. J.E.S. was never told his personal information was used for this purpose. A total of not less than \$4,454.00 was paid to the pre-paid debit card assigned to J.E.S, including PUA and LWAP payments.

70. Aggravated Identity Theft of D.M. Sr.

a. D.M. Sr. is G.T.'s and J.T.'s grandfather and V.M.'s father. In or about July, 2020, CHYTKA, G.T., J.T., and V.M. sought to obtain pandemic

unemployment benefits on behalf of D.M. Sr., even though, as they then well knew, D.M. Sr. was not eligible to receive such benefits.

b. On or about July 10, 2020, V.M. went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and G.T. V.M. provided D.M. Sr.'s PII to CHYTKA and G.T., including his Social Security Number and date of birth. Although V.M. was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. Between on or about July 10, 2020 and on or about July 20, 2020, CHYTKA and G.T. received via United States Post a Mastercard pre-paid debit card in the name of D.M. Sr. at 108 Twin Circle Drive, Lebanon, VA 24266. The card was never provided to D.M. Sr. CHYTKA and G.T. used the card to their own benefit.

d. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on D.M. Sr.'s behalf.

e. The filing of this fraudulent claim resulted in not less than \$12,444.00 being paid to the debit card assigned to D.M. Sr., including PUA and LWAP payments.

f. D.M. Sr. was interviewed by investigators and denied knowledge a claim was filed on his behalf. D.M. Sr. never authorized the use of his personal information for the purpose of filing a claim for pandemic unemployment benefits.

g. In recorded interviews, G.T., J.T., and V.M. each told

investigators D.M. Sr. had nothing to do with the filing of his claim.

CONCLUSION

71. In a recorded interview, CHYTKA told investigators everyone for whom she filed fraudulent claims knew she was filing fraudulent unemployment claims, and if they say they thought they were getting stimulus, “they are lying.”

CHYTKA said “they...they knew it was fraud pretty much...nobody thought it was stimulus. Everybody was like ‘oh – I’m gonna get my stimulus *on top* of this.”

72. The aggregate *actual* loss for all fraudulent claims filed with 108 Twin Circle Drive as the application address is not less than \$499,374.00.

The VEC recouped a total of \$43,444.00. The net realized loss to the United States is not less than \$455,930.00.

73. In addition to this amount, CHYTKA admitted to filing fraudulent claims for pandemic unemployment benefits for several people who were not listed on the VEC’s list of applications tied to 108 Twin Circle Drive. CHYTKA admitted to submitting fraudulent claims for several friends for whom she used their own personal addresses on the application.

COUNT ONE

18 U.S.C. § 371

(Conspiracy to Commit an Offense / Defraud the United States)

The United States Attorney charges that:

1. The Introduction is realleged and incorporated by reference.

2. Between on or about May 5, 2020, and on or about January 31, 2021 in the Western District of Virginia and elsewhere, **LEELYN DANIELLE CHYTKA** and others knowingly and willfully conspired and agreed with each other to (1) defraud the United States and (2) commit an offense against the United States, to wit: file fraudulent claims for pandemic unemployment benefits as authorized by, and administered through, federal law in violation of Title 18, United States Code, §1040(a), such benefits being authorized, paid, and disbursed in connection with the Coronavirus Disease (COVID-19) pandemic, an emergency declaration under §501 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

3. It was a part of the conspiracy that **LEELYN DANIELLE CHYTKA** and her co-conspirators submitted fraudulent claims for pandemic unemployment benefits in order to receive funds to which they were not entitled.

4. To effect the object of the conspiracy, **LEELYN DANIELLE CHYTKA** and her co-conspirators committed several acts, including but not limited to those acts described in the Introduction to this Information.

5. All in violation of Title 18, United States Code, § 371.

COUNT TWO

18 U.S.C. § 1349/1341

(Conspiracy to Commit Mail Fraud)

The United States Attorney charges that:

1. The Introduction is realleged and incorporated by reference.

2. Between on or about May 5, 2020, and on or about January 31, 2021 in the Western District of Virginia and elsewhere, **LEELYNN DANIELLE CHYTKA** and others knowingly conspired with each other to commit mail fraud of benefits authorized by, disbursed, and paid in connection with a presidentially declared major disaster or emergency as defined by section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42. U.S.C. § 5122 et. seq.), in violation of Title 18, United States Code, §1341, that is, having devised and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses and representations, and for the purpose of attempting to execute, and executing such scheme and artifice, received a matter or thing, to wit: government debit cards, that were sent and delivered by the United States Postal Service.

3. To effect the object of the conspiracy, **LEELYNN DANIELLE CHYTKA** and her co-conspirators committed several acts, including but not limited to, the acts described in the Introduction to this Information.

4. All in violation of Title 18, United States Code, § 1349 and § 1341.

COUNT THREE

18 U.S.C § 1028A

(Aggravated Identity Theft)

1. The Introduction is realleged and incorporated by reference.
2. On or about July 24, 2020, in the Western District of Virginia, **LEELYNN DANIELLE CHYTKA** and others knowingly used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. § 1040 and 18 U.S.C. § 1343, knowing that the means of identification belonged to another actual person, to wit: J.E.S.
3. All in violation of 18 U.S.C. § 1028A(a)(1).

COUNT FOUR

21 U.S.C § 841(a)(1)

(Distribution of Controlled Substances)

1. The Introduction is realleged and incorporated by reference.
2. Between on or about February 1, 2021 and on or about February 17, 2021, in the Western District of Virginia, **LEELYNN DANIELLE CHYTKA** knowingly distributed a controlled substance, to wit: Suboxone (buprenorphine), a Schedule III controlled substance, by causing Suboxone to be mailed into prison facilities by secreting the Suboxone behind stamps.
3. All in violation of Title 21, United States Code, Section 841(a)(1), and 841(b)(1)(E).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Information, the defendant shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 981(a)(1)(C), as authorized by 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

Money Judgment

Not less than \$455,930.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

Vehicles

- i. 1999 Chevrolet Tahoe, VIN: 11GNEK13R9XJ492006
- ii. 2000 Dodge Ram, VIN: 1B7HF13Z6YJ117900
- iii. 2001 Ford Mustang, VIN: 1FAFP45X91F259982
- iv. 2003 Toyota Camry, VIN: 4T1BE30K53U242112
- v. 2005 Dodge Neon, VIN: 1B3ES66SX5D146791
- vi. 2008 Honda Accord, VIN: 1HGCS11328A022370
- vii. 2009 Honda Civic, VIN: 2HGFG21539H700875

Personal Property

- viii. Dell Inspiron Laptop Computer, Serial Number 3SNV463

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty.

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

DATE: March 16, 2021

For 
DANIEL P. BUBAR
Acting United States Attorney